

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	
	<b>:</b>	
<b>v.</b>	<b>:</b>	<b>CRIMINAL NO.</b>
	<b>:</b>	
<b>JOHN MASTRONARDO</b>	<b>:</b>	<b>12-388-2</b>
<b>EDWARD FEIGHAN</b>	<b>:</b>	<b>12-388-9</b>
<b>KENNETH COHEN</b>	<b>:</b>	<b>12-388-10</b>
<b>JOANNA MASTRONARDO</b>	<b>:</b>	<b>12-388-16</b>

**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, the Court being advised that three of the defendants will plead guilty, and that the government will move to dismiss the case against the fourth defendant, the Court finds that these reasons cause the ends of justice to best be served by granting a continuance in this matter, that they outweigh the interests of the public and the defendant in a speedy trial, and therefore, pursuant to Title 18, United States Code, Sections 3161(h)(1)(G), 3161(h)(7)(A), 3161(h)(7)(B)(i), 3161(h)(7)(B)(ii), and 3161(h)(7)(B)(iv) it is hereby

**ORDERED**

that the trial on February 3, 2014, in the above action is continued.

**BY THE COURT:**

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**HONORABLE JAN E. DUBOIS**  
United States District Court Judge

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JOANNA MASTRONARDO	:	12-388-16

**MOTION FOR CONTINUANCE  
PURSUANT TO 18 U.S.C. § 3161**

The United States of America, by its attorneys, Zane David Memeger, United States Attorney in and for the Eastern District of Pennsylvania, and Jason P. Bologna, Assistant United States Attorney, and Special Assistant United States Attorney Kelly Pearson, respectfully requests a continuance of the trial against John Mastronardo, Edward Feighan, Kenneth Cohen, and Joanna Mastronardo that is currently scheduled for February 3, 2014. None of these four defendants object to the government's motion to continue the February 3<sup>rd</sup> trial date. In support of this motion, the government avers as follows:

1. Defendant John Mastronardo was brought into federal custody on or about August 8, 2012, for an initial appearance on an indictment charging him with conspiracy to participate in a racketeering enterprise, in violation of 18 U.S.C. § 1962(d), conducting an illegal gambling business, in violation of 18 U.S.C. § 1955, three counts of conspiring to launder money, in violation of 18 U.S.C. § 1956(h), and two counts of the transmission of wagering information, in violation of 18 U.S.C. § 1084.

2. Defendant Edward Feighan was brought into federal custody on or about August 8, 2012, for an initial appearance on an indictment charging him with conspiracy to participate in

a racketeering enterprise, in violation of 18 U.S.C. § 1962(d) and conducting an illegal gambling business, in violation of 18 U.S.C. § 1955.

3. Defendant Kenneth Cohen was brought into federal custody on or about August 8, 2012, for an initial appearance on an indictment charging him with conspiracy to participate in a racketeering enterprise, in violation of 18 U.S.C. § 1962(d) and conducting an illegal gambling business, in violation of 18 U.S.C. § 1955.

4. Defendant Joanna Mastronardo was brought into federal custody on or about August 8, 2012, for an initial appearance on an indictment charging her with aggravated structuring, in violation of 31 U.S.C. § 5324(a)(1) and (d)(2).

5. Defendants John Mastronardo, Edward Feighan, Kenneth Cohen, and Joanna Mastronardo were granted pre-trial release on August 8, 2012.

6. Defendants John Mastronardo, Edward Feighan, Kenneth Cohen, and Joanna Mastronardo remain on pre-trial release as of the filing of this motion on January 31, 2014.

7. Pursuant to a government motion that was unopposed by any of the sixteen defendants indicted in this matter, the Honorable Jan E. DuBois declared this matter a complex case and entered an Order as such in 2012.

8. As of January 1, 2014, fourteen of the sixteen indicted defendants were scheduled to proceed to trial on February 3, 2014. This group of fourteen defendants included John Mastronardo, Edward Feighan, Kenneth Cohen, and Joanna Mastronardo.

9. As of January 10, 2014, the government and the fourteen defendants verbally agreed to a global guilty plea.

10. As of January 31, 2014, ten of the fourteen defendants will have entered guilty pleas before the Court. The only remaining defendants are John Mastronardo, Edward Feighan, Kenneth Cohen, and Joanna Mastronardo.

11. Dennis Cogan, Esq., represents John Mastronardo. Mr. Cogan is recuperating from a medical procedure that was conducted on January 28, 2014. He has reported that his client will enter a guilty plea as soon as he (Mr. Cogan) is healthy enough to appear in Court.

12. Louis Busico, Esq., represents Edward Feighan. Mr. Busico is resolving complications arising from a fire at his office on January 27, 2014. He has reported that his client will enter a guilty plea. A change of plea hearing is scheduled for February 7, 2014.

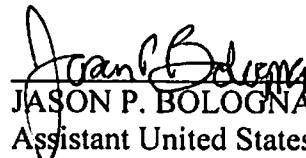
13. Dennis Caglia, Esq., represents Kenneth Cohen. Mr. Caglia is appearing in Court on February 3, 2014, with his client. Mr. Caglia has reported that Mr. Cohen will enter a guilty plea on February 3<sup>rd</sup>.

14. William Brennan, Esq., represents Joanna Mastronardo. Mr. Brennan has negotiated the dismissal of the case against Joanna Mastronardo. The government will move for that dismissal after Joseph Vito Mastronardo, Jr., and Joseph F. Mastronardo, have both pled guilty and been sentenced by this Court.

WHEREFORE, the government respectfully submits that the ends of justice will best be served by a continuance in this matter.

Respectfully submitted,

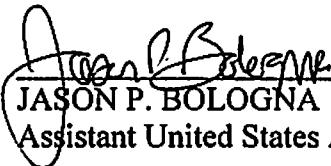
ZANE DAVID MEMEGER  
United States Attorney

  
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JASON P. BOLOGNA  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Government's Motion for a Continuance has been served by electronic filing on:

Dennis Cogan, Esq.  
Louis Busico, Esq.  
Dennis Caglia, Esq.  
William Brennan, Esq.

  
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JASON P. BOLOGNA  
Assistant United States Attorney

Date: January 31, 2014